

**REMARKS**

Applicants thank the Examiner for acknowledging the claim for priority under 35 U.S.C. § 119, and receipt of a certified copy of the priority document submitted January 5, 2004.

Applicants thank the Examiner for considering the reference cited with the *Information Disclosure Statement* filed January 5, 2004.

Applicants thank the Examiner for indicating that the Formal Drawings filed May 26, 2004 are accepted.

**Status of the Application**

Claims 1-20 are all the claims pending in the Application. Claims 1-20 stand rejected.

**Anticipation Rejection**

The Examiner has rejected: (1) claims 1-14 under 35 U.S.C. § 102(b) as being anticipated by *Karlotski et al.* (US 4,942,330; hereinafter “*Karlotski*”); and (2) claims 15-20 under 35 U.S.C. § 103(a) as being unpatentable over *Karlotski* in view of *Strok et al.* (US 5,952,768; hereinafter “*Strok*”). These rejections are respectfully traversed.

**Independent Claims 1 and 8**

Regarding independent claims 1 and 8, the Examiner alleges that *Karlotski* discloses all the features recited therein. Applicants respectfully disagree, and submit that *Karlotski* fails to teach or suggest the “strip-shaped first light blocking portion” recited in these claims. Rather, *Karlotski*’s mesh 34 (which the Examiner alleges to correspond to the “light blocking portion”) is constructed of ceramic fibers for containing debris of light source capsule 14, should light

source capsule 14 fail. Applicants respectfully submit that these fibers cannot reasonably be read as being “strip-shaped.”

Thus, Applicants respectfully submit that independent claims 1 and 8 are patentable over the applied references. Further, Applicants respectfully submit that rejected dependent claims 2-7 and 9-14 are allowable, *at least* by virtue of their dependency.

Additionally, Applicants respectfully submit that rejected dependent claims 2-7 and 9-14 are separately patentable over the applied references.

For example, regarding claims 3, 4, 10 and 11, Applicants respectfully submit that *Karlotski* fails to teach or suggest either: (1) that a second light blocking portion “has a width, in an axial direction of the light emitting tube, at least corresponding to a width, in the axial direction, of said front sealed end portion of said light emitting tube” (claims 3 and 10); or (2) that a first light blocking portion “has a width, in an axial direction of the light emitting tube, at least corresponding to a width, in the axial direction, of said rear sealed end portion of said light emitting tube” (claims 4 and 11). In contrast, the ceramic fibers of *Karlotski’s* mesh 34 have a very small diameter that cannot reasonably be read as corresponding to any particular sealed end portion of light source capsule 14.

*Independent Claim 15*

Regarding independent claim 15, the Examiner alleges that *Karlotski* discloses many of the features recited therein, but fails to teach or suggest the recited means for “positioning a hot zone” and “substantially reducing a glare light.” Nevertheless, the Examiner applies *Strok*, taking the position that *Strok* discloses such features (as element 58 in FIG. 2 and in column 4,

lines 7-24). Additionally, the Examiner alleges that one of skill would have been motivated to modify *Karlotski* in view of *Strok* to “improve the efficacy, life and color of the lamp” (*O.A.*, p. 9).

Applicants respectfully disagree. Even if it were possible to modify *Karlotski* in view of *Strok* as the Examiner has alleged (which Applicants do not concede), Applicants respectfully submit that neither *Karlotski* nor *Strok* (nor any combination thereof) teaches or suggests a “means for positioning a hot zone of a luminous distribution at a cutoff line of said luminous distribution, and substantially reducing a glare light output.”

Specifically, *Strok* does not even mention a “cutoff line” or a “hot zone of a luminous distribution” anywhere in its disclosure, let alone teach or suggest that its transparent coating 58 could in any way position a hot zone of such a luminous distribution at such a cutoff line.

Rather, *Strok* simply discloses that its transparent coating 58 is provided to “impose an additional heat load on a cold region of the lamp itself to reduce the thermal gradient and maintain a high metal halide vapor pressure” (col. 4, lines 15-19). Thus, *Strok*’s coating 58 is provided to manage internal heat gradients of its arc tube 16. However, these internal heat gradients have absolutely no similarity to the recited hot zone of a luminous distribution (*i.e.*, the projected light pattern). Applicants direct the Examiner to FIG. 4 (and its accompanying description) of the Application for a discussion of what a luminous distribution, and a hot zone thereof, is. In fact, no luminous distribution patterns are even contemplated by *Strok*, let alone the arrangement of a hot zone thereof in relation to a cutoff line.

*Karlotski*, as the Examiner concedes, is also silent regarding these features.

Thus, as neither reference can reasonably be read as teaching or suggesting the claimed features, Applicants respectfully submit that independent claim 15 is patentable over the applied references. Further, Applicants respectfully submit that rejected dependent claims 16-20 are allowable, *at least* by virtue of their dependency.

Additionally, Applicants respectfully submit that rejected dependent claims 16-20 are separately patentable over the applied references.

For example, Applicants respectfully submit that neither *Karlotski* nor *Strok* (nor any combination thereof) teaches or suggests claim 16's recitation of "a strip-shaped first light blocking portion." Specifically, Applicants respectfully submit that *Karlotski* is deficient with respect to this feature for at least the reasons discussed above with respect to independent claims 1 and 8. Further, Applicants respectfully submit that *Strok* is also deficient regarding this feature, as it does not teach or suggest any particular "light blocking portion," or any shape of such a feature.

Further, Applicants respectfully submit that neither *Karlotski* nor *Strok* (nor any combination thereof) teaches or suggests claim 18's recitation: (1) that a second light blocking portion "has a width, in an axial direction of the light emitting tube, at least corresponding to a width, in the axial direction, of said front sealed end portion of said light emitting tube;" or (2) that a first light blocking portion "has a width, in an axial direction of the light emitting tube, at least corresponding to a width, in the axial direction, of said rear sealed end portion of said light emitting tube." Specifically, Applicants respectfully submit that *Karlotski* is deficient with respect to this feature for at least the reasons discussed above with respect to dependent claims 3,

4, 10 and 11. Further, Applicants respectfully submit that *Strok* is also deficient, as it does not teach or suggest any particular "light blocking portion," or any widths of such a feature.

Thus, Applicants respectfully request that the Examiner withdraw these rejections.


**Conclusion**

In view of the foregoing, it is respectfully submitted that claims 1-20 are allowable. Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-20.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,

  
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